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Attorneys for Defendant The Federal Savings Bank

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PROFICIO MORTGAGE VENTURES, LLC,

Plaintiff,

v.

THE FEDERAL SAVINGS BANK,

Defendant.

Case No. 2:15-cv-00510-RFB-MDC

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR DEFENDANT
THE FIRST SAVINGS BANK TO: (1)
RESPOND TO PLAINTIFF'S MOTION
FOR ATTORNEYS' FEES AND COSTS
(ECF No. 328); AND (2) OBJECT TO
PLAINTIFF'S BILLS OF COSTS (ECF
Nos. 326, 327)**

(First Request)

Defendant The Federal Savings Bank ("TFSB") respectfully requests that the Court extend the deadline for TFSB to file its response to PMV's Motion for Attorneys' Fees and Costs (ECF No. 328); and to Object to PMV's Bills of Costs (ECF Nos. 326, 327) by sixty (60) days, from May 3, 2024 to July 3, 2024. Plaintiff Proficio Mortgage Ventures, LLC ("PMV") consents to the requested extension. This is the first request to extend the deadline.

TFSB seeks the requested extension to account for a pre-scheduled out of the country vacation for Daniel Hefter, TFSB's lead counsel, and TFSB's expert retained for purposes of responding to the pending motion for fees, costs and prejudgment interest; and to permit time for TFSB to fully respond to the requested fees, costs and prejudgment interest sought by PMV, as

1 well as object to the Bills of Costs. PMV has consented to the requested extension. The
2 undersigned represent that this stipulation is not designed for purposes of delay.

3 DATED this 30th day of April, 2024.

4 McDONALD CARANO LLP

FOLEY & LARDNER LLP

5 By: /s/ Kristen T. Gallagher

By: /s/ Christi A. Lawson

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11 *Attorneys for Defendant The Federal
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*Attorneys for Plaintiff Proficio Mortgage
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15 IT IS SO ORDERED.

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18
19 Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
Dated: 5/2/2024

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